

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS - EASTERN DIVISION**

**In re:** ) **Chapter 13**  
 )  
**Rick Kogan,** ) **Case No. 20-02173**  
 )  
**Debtor.** ) **Judge Deborah L. Thorne**

**NOTICE OF MOTION**

To: See Attached Service List.

**PLEASE TAKE NOTICE** that on Wednesday, November 25, 2020, at 1:00 p.m., I will appear before the Honorable Deborah L. Thorne, or any judge sitting in that judge's place, and present the motion of Justin R. Storer to Withdraw as Attorney, a copy of which is attached.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is 160 9362 1728 and no password is required. The meeting ID and password can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Date: November 13, 2020

**Justin R. Storer**

By: /s/ Justin R. Storer

Justin R. Storer (ARDC # 6293889)  
Bauch & Michaels, LLC  
53 W. Jackson Blvd., Suite 1115  
Chicago, IL 60604  
312.662.5757  
[jstorer@bmlawllc.com](mailto:jstorer@bmlawllc.com)

**CERTIFICATE OF SERVICE**

I, Justin R. Storer, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on November 13, 2020 at 3:11 PM.

\_\_\_\_\_  
/s/ Justin R. Storer

**SERVICE LIST:**

Via CM/ECF to

Adham Alaily, representing BMO Harris Bank, N.A.

Marilyn O. Marshall, Standing Trustee

Michale Dimand, representing Bayview Loan Servicing, LLC

Bryan Wiley, representing Jackson Towers Condominium Association, Inc.

Via first class mail to

Rick Kogan  
160 N. Stetson  
Chicago, IL 60601

UNITED STATES BANKRUPTCY COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

**MOTION TO WITHDRAW AS ATTORNEY**

Justin Storer hereby moves for the entry of an order granting him authorization to withdraw from his representation of the Debtor and in support of this Motion, states the following:

## **I. JURISDICTION AND VENUE**

1. This Court has jurisdiction over this case pursuant to 28 U.S.C. § 1334 and venue is proper pursuant to 28 U.S.C. § 1408.
2. By Internal Operating Procedure 15 of the United States District Court for the Northern District of Illinois, the District Court has referred all bankruptcy cases to the Bankruptcy Court for initial determination, as permitted by 28 U.S.C. § 157(a).

4. The Debtor filed a petition for relief under chapter 11 on May 28, 2020.
5. One of the Debtor's attorneys, Justin Storer, has taken new employment.
6. The Debtor will continue to be represented by the professionals of Bauch & Michaels, LLC, including, principally, Carolina Sales, who has been in all respects spearheading the Debtor's case since before its commencement.

**III. REQUESTED RELIEF**

7. Justin Storer requests that this Court enter an order authorizing his withdrawal as attorney of record for the Debtor.

**IV. BASIS FOR REQUESTED RELIEF**

8. Rule 1.16(c)(7) of the ABA Model Rules of Professional Conduct specify that a lawyer may withdraw from representing a client if good cause for withdrawal exists.

9. Under this Court's Local Rule 2091-1, an attorney of record may not withdraw without first obtaining leave of Court by motion.

**V. NOTICE**

10. Notice of this Motion has been provided to the Debtor, the Office of the United States Trustee, the Standing Trustee, and all parties who have requested or receive notice through CM/ECF. In light of the nature of the relief requested, the undersigned requests that this Court find the notice sufficient under the circumstances and waive with any further notice requirements.

**WHEREFORE**, Justin R. Storer respectfully requests that the Court enter an order authorizing him to withdraw from his representation of the Debtor in the above-captioned case and entering such further relief as this Court may deem just and proper.

Date: November 13, 2020

**Justin R. Storer**

By: /s/ Justin R. Storer

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